

1 KATHLEEN BLISS, ESQ. (NV Bar #7606)  
2 Email: kb@kathleenblisslaw.com  
3 **KATHLEEN BLISS LAW, PLLC**  
4 1070 West Horizon Ridge Parkway, Suite 202  
5 Henderson, Nevada 89012  
6 Tele: (702) 463-9074

7 **-and-**

8 PAUL S. PADDA, ESQ. (NV Bar #10417)  
9 Email: psp@paulpaddalaw.com  
10 DAVID J. STANDER, ESQ. (*Admitted PHV*)  
11 Email: dstanderlaw@gmail.com  
12 **PAUL PADDA LAW, PLLC**  
13 4560 South Decatur Blvd., Suite 300  
14 Las Vegas, Nevada 89103  
15 Tele: (702) 366-1888

16 **-and-**

17 DOUGLASS A. MITCHELL, ESQ. (NV Bar #3775)  
18 Email: dmitchell@jenner.com  
19 **JENNER & BLOCK, LLP**  
20 1099 New York Avenue, N.W., Suite 900  
21 Washington, D.C. 20001-4412  
22 Tele: (202) 639-6090

23 Attorneys for Plaintiff

24 **UNITED STATES DISTRICT COURT**  
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE  
27 MEMORIAL HOSPITAL, INC. (doing  
28 business as “Sage Memorial Hospital”); an  
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company  
(doing business as “Razaghi Healthcare”),  
AHMAD R. RAZAGHI; individually, TAUSIF  
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND  
PLAINTIFF’S TIME TO RESPOND TO  
DEFENDANTS’ MOTION TO DISMISS  
(SECOND REQUEST)**

Pursuant to Federal Rule of Civil Procedure 6 and the Court's Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court's approval, to permit Plaintiff additional time, to and until November 8, 2021, to respond to Defendant's motion to dismiss which was previously filed on August 23, 2021 (ECF No. 147). Presently, Plaintiff's response is due today, November 1, 2021. This is Plaintiff's second request for an extension of time for the reasons cited herein.

In support of this Stipulation, the parties agree to the following:

1. Good cause exists to support this request for additional time. Plaintiff's counsel represent they have been working diligently on a response to the pending dispositive motion but due to recent circumstances will not be able to timely complete a response. Specifically, during the past week, both Douglass Mitchell, Esq. and Paul S. Padda, Esq. were required to travel for business and were not able to devote the time necessary to finalizing their portion and contributions towards the response brief. Additionally, during this same time, Mr. Mitchell was also required to work on settlement matters relating to another significant case and was unable to devote sufficient time to Plaintiff's response. Mr. Padda, apart from having to travel out of town on a federal criminal matter, was also busy with discovery in a separate state civil case.

2. Counsel for the respective parties have discussed this request for extension and agree that an extension of time to and until November 8, 2021 is appropriate under the circumstances. The parties further agree that Defendants shall have 30-days following Plaintiff's filing of a response within which time to file a reply.

. . .

. . .

. . .

. . .

. . .

. . .

. . .

. . .

1 The parties respectfully request the Court approve this Stipulation.

2  
3 /s/ Kris Leonhardt

/s/ Paul S. Padda

4 \_\_\_\_\_  
5 Pavneet S. Uppal, Esq.  
6 Kris Leonhardt, Esq.  
7 Brian L. Bradford, Esq.  
8 *Counsel for all named Defendants*

\_\_\_\_\_

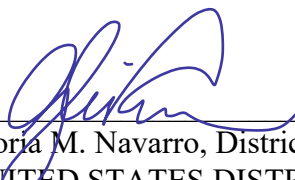
Kathleen Bliss, Esq.  
Paul S. Padda, Esq.  
David Stander, Esq.  
Douglass A. Mitchell, Esq.  
*Counsel for Plaintiff*

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19 Dated: November 1, 2021

Dated: November 1, 2021

20  
21  
22 **IT IS SO ORDERED.**

23  
24  
25  
26  
27  
28 Dated this 1 day of November, 2021

  
\_\_\_\_\_  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT